

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE )  
CENTRE GMBH and WEST PUBLISHING )  
CORPORATION, )  
Plaintiffs and )  
Counterdefendants, )  
v. ) C.A. No. 20-613 (SB)  
ROSS INTELLIGENCE INC., ) REDACTED - PUBLIC VERSION  
Defendant and )  
Counterclaimant. )  
)

**DECLARATION OF MAX SAMELS IN SUPPORT OF THOMSON REUTERS'  
RESPONSE BRIEF IN OPPOSITION TO ROSS'S MOTION TO EXCLUDE CERTAIN  
OPINIONS OF DR. CHAD SYVERSON**

I, Max Samels, declare as follows:

1. I am an attorney at the law firm of Kirkland & Ellis LLP, counsel of record for Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation (collectively, "Plaintiffs" or "Thomson Reuters"). I am admitted and in good standing to practice law in the state of Illinois, and I am admitted *pro hac vice* to practice in this District for the above-captioned case. I submit this declaration in support of Thomson Reuters' Response Brief in Opposition to ROSS's Motion to Exclude Certain Opinions of Dr. Chad Syverson. The statements set forth in this declaration are based on my personal knowledge and my review of the contemporaneous documents referenced and attached hereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the deposition of Chad Syverson, held on August 2, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 28th day of September, 2023.

  
\_\_\_\_\_  
Max Samels

**CERTIFICATE OF SERVICE**

I hereby certify that on September 28, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on September 28, 2023, upon the following in the manner indicated:

David E. Moore, Esquire  
Bindu Palapura, Esquire  
POTTER ANDERSON & CORROON LLP  
Hercules Plaza, 6th Floor  
1313 North Market Street  
Wilmington, DE 19801  
*Attorneys for Defendant and Counterclaimant*

*VIA ELECTRONIC MAIL*

Mark A. Klapow, Esquire  
Lisa Kimmel, Esquire  
Crinesha B. Berry, Esquire  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue NW  
Washington, DC 20004  
*Attorneys for Defendant and Counterclaimant*

*VIA ELECTRONIC MAIL*

Gabriel M. Ramsey, Esquire  
Jacob Canter, Esquire  
Warrington Parker, Esquire  
CROWELL & MORING LLP  
3 Embarcadero Center, 26th Floor  
San Francisco, CA 94111  
*Attorneys for Defendant and Counterclaimant*

*VIA ELECTRONIC MAIL*

*/s/ Michael J. Flynn*

---

Michael J. Flynn (#5333)

# **EXHIBIT 1**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF DELAWARE

3                   THOMSON REUTERS ENTERPRISE         )  
4                   CENTRE GMBH and WEST PUBLISHING    )  
5                   CORPORATION,                              )  
6    )  
7    )  
8    )  
9    )  
10                  - vs -                                      ) C.A. No. 20-613-SB  
11                  )  
12                  )  
13                  ROSS INTELLIGENCE INC.,                )  
14                  )  
15                  )  
16                  Defendant/                              )  
17                  )  
18                  Counterclaimant.                        )

19                  Video-recorded deposition of CHAD SYVERSON,  
20                  PH.D., taken before TRACY L. BLASZAK, CSR, CRR, and  
21                  Notary Public, pursuant to the Federal Rules of Civil  
22                  Procedure for the United States District Courts  
23                  pertaining to the taking of depositions, at Suite 3600,  
24                  455 North Cityfront Plaza Drive, in the City of Chicago,  
                        Cook County, Illinois at 9:01 a.m. on the 2nd day of  
                        August, A.D., 2023.

There were present at the taking of this deposition the following counsel:

KIRKLAND & ELLIS LLP by  
MS. CHRISTA C. COTTRELL  
300 North LaSalle Street  
Chicago, Illinois 60654  
(312) 862-2000  
[christa.cottrell@kirkland.com](mailto:christa.cottrell@kirkland.com)  
on behalf of the Plaintiffs/  
Counterdefendants;

CROWELL & MORING LLC by  
MS. BEATRICE B. NGUYEN  
3 Embarcadero Center  
Suite 2600  
San Francisco, California 94111  
(415) 986-2800  
[bbnguyen@crowell.com](mailto:bbnguyen@crowell.com)  
on behalf of the Defendant  
Counterclaimant;

ALSO PRESENT: Mr. Christopher Ody  
Analysis Group;

Mr. Brandon Rackowski  
Legal Videographer.

- - - - -

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1 STATE OF ILLINOIS )

) ss:

2 COUNTY OF COOK )

3

4 The within and foregoing deposition of the  
5 aforementioned witness was taken before TRACY L.  
6 BLASZAK, CSR, CRR, and Notary Public, at the place, date  
7 and time aforementioned.

8 There were present during the taking of the  
9 deposition the previously named counsel.

10 The said witness was first duly sworn and was  
11 then examined upon oral interrogatories; the questions  
12 and answers were taken down in shorthand by the  
13 undersigned, acting as stenographer and Notary Public;  
14 and the within and foregoing is a true, accurate and  
15 complete record of all of the questions asked of and  
16 answers made by the aforementioned witness, at the time  
17 and place hereinabove referred to.

18 Before completion of the deposition review of  
19 the transcript was not requested.

20 The undersigned is not interested in the within  
21 case, nor of kin or counsel to any of the parties.

22

23

24

1                   Witness my official signature and seal as  
2                   Notary Public in and for Cook County, Illinois, on this  
3                   4th day of August, A.D. 2023.  
4  
5  
6

7                     
8

9                   TRACY L. BLASZAK, CSR, CRR

10                  CSR No. 084-002978

11                  One North Franklin Street

12                  Suite 3000

13                  Chicago, Illinois 60606

14                  Phone: (312) 442-9087

15

16

17

18

19

20

21

22

23

24